

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

LINDA TAYLOR	§	CIVIL ACTION
NO.		
Plaintiff	§	4:12-CV-01975
	§	
	§	
Vs.	§	
	§	
TEXAS SOUTHERN UNIVERSITY	§	
Defendant	§	

JOINT DISCOVERY/CASE MANAGEMENT PLAN  
UNDER RULE 26(f)  
FEDERAL RULES OF CIVIL PROCEDURE

Please restate the instruction before furnishing the information.

1. State where and when the meeting of the parties required by Rule 26(f) was held, and identify the counsel who attended for each party.

Counsel for Plaintiff, Linda Taylor, Peggy Lantz and counsel for Defendant, Darren G. Gibson, conferred on August 27, 2012 via telephone conference.

2. List the cases related to this one that are pending in any state or federal court with the case number and court.

None

3. Briefly describe what this case is about.

Plaintiff alleges that Defendant violated her civil rights by discriminating against her because of her age, gender and race and the Defendant unlawfully retaliated against her while she was employed by Texas Southern University. Defendant denies that Plaintiff was subject to discrimination or retaliation, and alleges that all employment decisions related to Plaintiff were made for legitimate non-discriminatory, non-retaliatory reasons.

4. Specify the allegation of federal jurisdiction.

This court has jurisdiction under 28 U.S.C. § 1331 based on Plaintiff's claims under 42 U.S.C. § 2000e.

5. Name the parties who disagree and the reasons.

None

6. List anticipated additional parties that should be included, when they can be added, and by whom they are wanted.

None

7. List anticipated interventions.

None

8. Describe class-action issues.

None

9. State whether each party represents that it has made the initial disclosures required by Rule 26(a). If not, describe the arrangements that have been made to complete the disclosures.

The parties have not made their initial disclosures pursuant to Rule 26(a), but each party will do so on or before the initial pretrial and scheduling conference.

10. Describe the proposed agreed discovery plan, including:

- A. Responses to all the matters raised in Rule 26(f).

Discovery will be conducted within the limits set forth in the Federal Rules of Civil Procedure in accordance with the schedule set forth below, or as otherwise ordered by the Court.

- B. When and to whom the plaintiff anticipates it may send interrogatories.

Plaintiff anticipates sending interrogatories to the Defendants prior to the close of discovery in this matter such that any responses will be due prior to the end of the discovery period.

- C. When and to whom the defendant anticipates it may send interrogatories.

Defendant anticipates sending interrogatories to the Plaintiff prior to the close of discovery in this matter such that any responses will be due prior to the end of the discovery period.

D. Of whom and by when the plaintiff anticipates taking oral depositions.

Plaintiff anticipates deposing Ron Cornelius, internal auditor, Dean Lillian Poats, Dr. Marie Horton, Dr. Jay Cummings, Keisha David, Human Resources as well as members of human resources not yet identified.

E. Of whom and by when the defendant anticipates taking oral depositions.

Defendant anticipates deposing plaintiff and other fact witnesses to be determined by the close of discovery in this matter.

F. When the plaintiff (or the party with the burden of proof on an issue) will be able to designate experts and provide the reports required by Rule 26(a)(2)(B), and when the opposing party will be able to designate responsive experts and provide their reports.

Plaintiff will be able to designate experts and provide reports required by Rule 26(a)(2)(B) by February 28, 2012. Defendant will be able to designate responsive experts and provide their reports by March 29, 2012.

G. List expert depositions the plaintiff (or the party with the burden of proof on an issue) anticipates taking and their anticipated completion date. See Rule 26(a)(2)(B)(expert report).

Plaintiff has not determined the expert depositions she anticipates taking at this time.

H. List expert depositions the opposing party anticipates taking and their anticipated completion date. See Rule 26(a)(2)(B) (expert report).

Defendant anticipates taking the depositions of any experts designated by Plaintiff. These depositions are anticipated to occur shortly after the expert is designated and the report is furnished.

11. If the parties are not agreed on a part of the discovery plan, describe the separate views and proposals of each party.

None

12. Specify the discovery beyond initial disclosures that has been undertaken to date.

None

13. State the date the planned discovery can reasonably be completed.

The parties assert that discovery can be completed by April 30, 2012.

14. Describe the possibilities for a prompt settlement or resolution of the case that were discussed in your Rule 26(f) meeting.

The parties assert that mediation may be appropriate after discovery has been conducted in this case.

15. Describe what each party has done or agreed to do to bring about a prompt resolution.

See above.

16. From the attorneys' discussion with the client, state the alternative dispute resolution techniques that are reasonably suitable, and state when such a technique may be effectively used in this case.

See above.

17. Magistrate judges may now hear jury and non-jury trials. Indicate the parties' joint position on a trial before a magistrate judge.

The parties do not agree to trial before a magistrate judge.

18. State whether a jury demand has been made and if it was made on time.

Plaintiff has made a jury demand timely.

19. Specify the number of hours it will take to present the evidence in this case.

Plaintiff estimates that it will take 8 to 12 hours to present her evidence in this case. Defendant anticipates it will take approximately 8 to 12 hours to present its evidence.

20. List pending motions that could be ruled on at the initial pretrial and scheduling conference.

None.

21. List other motions pending.

None.

22. Indicate other matters peculiar to this case, including discovery, that deserve the special attention of the court at the conference.

The parties assert that there are not matters peculiar to this case that deserve the special attention of the Court at this time.

23. List the names, bar numbers, addresses and telephone numbers of all counsel.

Counsel for Plaintiff

Peggy J. Lantz  
Texas Bar No. 24002452  
10497 Town & Country Way Ste. 700  
Houston, TX 77024  
Telephone 832-364-0425  
Facsimile 832-204-4242  
Email: [peggylantz@lantzlaw.com](mailto:peggylantz@lantzlaw.com)  
Lorri Meraz Grabowski  
Texas Bar No. 24069817  
c/o 10497 Town & Country Way Ste. 700  
Houston, TX 77024

Counsel for Defendant

Darren G. Gibson  
Texas Bar No. 24068846  
Office of the Attorney General  
General Litigation Division -019  
P.O. Box 12548, Capitol Station  
Austin, TX 78711-2548  
512-463-2120  
Fax 512-320-0667